UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

June 23, 2005

B19-J

Mr. Robert Lueckel
Forest Supervisor
Ottawa National Forest
E6248 US Highway 2
Ironwood, Michigan 49938

RE: U.S. EPA Comments on the Draft Environmental Impact Statement (DEIS) and Proposed Land and Resource Management Plan (LRMP) for the Ottawa National Forest, Michigan, March 2005, CEQ#: 20050118

Dear Mr. Lueckel:

The U.S. Environmental Protection Agency has received the document listed above. Under the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations, and Section 309 of the Clean Air Act; U.S. EPA reviews and comments on major federal actions. We are pleased to have the opportunity to offer U.S. EPA's views and suggestions to the planning effort of the National Forest.

The Ottawa National Forest encompasses about one million acres within the western end of Michigan's Upper Peninsula and is composed predominantly of Northern hardwood tree species. The Ottawa land base lies in the transition between the northern boreal forest and eastern deciduous forest. A great diversity of species are supported in this environment, such as timber wolves, bald eagles, loons, bobcat, various species of trout, lake sturgeon, unique aquatic species, and many kinds of ferns and flowering plants. The forest has a remote solitude that is unique and is a frequent destination for people craving a natural and peaceful experience.

The LRMP describes the vegetative composition and other aspects of 17 Management Areas (MAs). The DEIS presents 4 alternatives that include different arrangements and acreages of these management areas. Alternative 1 represents the "no-action" alternative, which would carry forward with the 1986 Forest Plan with adjustments to bring it into compliance with existing laws and current agency guidelines. The United States Forest Service (USFS) chose Alternative 3 as the preferred alternative.

Alternative 3 emphasizes northern hardwoods ecosystems using uneven-aged and even - aged management to produce quality hardwood timber products and provide habitat for associated wildlife. Alternative 3 would designate approximately 48% of the Ottawa acreage as total suitable forest land and approximately 17% to be managed as old growth. Alternative 3

puts more emphasis on late successional northern hardwoods than Alternatives 1 and 4 and less emphasis than Alternative 2. Alternative 3 has slightly less total suitable forest land than Alternatives 2 and 4 and has the highest allowable sale quantity of all the alternatives. When comparing other aspects of the alternatives such as all terrain vehicle (ATV) management and old growth, Alternative 3 falls in between Alternatives 2 and 4 for trail miles and acreage. All other secondary issues are treated the same in Alternatives 2, 3 and 4. U.S. EPA rates the preferred alternative as **"EC-2", Environmental Concerns-Insufficient Information.** A copy of U.S. EPA's rating definitions is enclosed.

The primary difference found in the Management Area acreage allocations between the alternatives resides in MA 2.1 and MA 2.2. A slightly higher percentage of northern hardwoods and long-lived conifers characterize MA 2.2. This MA would also provide greater late successional habitat and less even-aged cutting than MA 2.1. Management Area 2.2 would boast less aspen, paper birch and permanent openings. Therefore, MA 2.2 would ensure that even greater suitable habitat exists in the future for the viability of the suite of late successional species. This would provide a greater chance of changing some areas of the Ottawa to historic conditions of "uneven-aged mesic forests characterized by supercanopies of centuries old trees (Cleland et al. 2004a)."

U.S. EPA suggests a hybrid alternative. We suggest changing Alternative 3 in the following way:

- Shift the balance of acreage in MAs 2.1 and 2.2. Move in the direction of Alternative 2, which provides more acreage in MA 2.2 and less in 2.1.

We commend the USFS for the addition of Special Interest Areas, for the change in ATV management (i.e., all areas of the Ottawa closed unless posted open), and for partnering in studies to regenerate hemlock. We also recognize the monumental task of presenting all the multiple uses of the forest and their impacts. The formats of the DEIS and LRMP presented the information in a logical manner.

We have additional detailed comments about water quality, ATV management, deer management, old growth, and other general items. Please see the enclosure entitled, *"U.S. EPA comments on the Ottawa National Forest LRMP and DEIS."*

Thank you for the opportunity to review the DEIS. If you have any questions, please contact Julie Guenther of my staff at 312-886-3172. Please send our office one copy of the Final EIS.

Sincerely,

/s/

Kenneth A. Westlake, Chief
NEPA Implementation Section

cc: Randy Moore, Regional Forester
Jessica Hogras, USFWS

Enclosures: (1) *U.S. EPA comments on the Ottawa National Forest LRMP and DEIS*
(2) Summary of Rating Definitions and Follow up Action

U.S. EPA comments on the Ottawa National Forest LRMP and DEIS

Water Quality

In the planning process for the LRMP, the USFS has the opportunity to use Michigan's Clean Water Act Section 303(d) impaired waters list to assist in setting water quality standards and guidelines. We recommend incorporating the impaired waters listed by the State into the cumulative effects analysis, and using the impaired waters list to help focus watershed management efforts to improve overall water quality. Please contact the state (contacts listed at http://www.michigan.gov/deq/0,1607,7-135-3313_3686_3728-12464--,00.html) to find out the status of any proposed total maximum daily load (TMDL) allocations for these water bodies.

U.S. EPA requests that the Forest Service re-examine specific forest management prescriptions in these watersheds to determine if incompatibilities with these resource protection objectives exist. We also recommend that the USFS partner with state and local agencies to assist with restoration of these waters, particularly those water bodies where the Forest Service may also be a contributor to the impairment or is a significant landholder in these watersheds.

The DEIS on page 3 -19 indicates that, for Alternatives 2 through 4, clearcutting young aspen forests (less than 16 years old) up to 60% of the area along a 6th level watershed will become an established threshold. Research suggests that this threshold can be reached without any water quality affects (Veery 2000). Does this research address impacts to species located in the riparian area? Will the areas guided by this threshold continue to be monitored? Will the management strategy be changed if it is found that water quality is negatively impacted?

The 1986 Forest Plan designated a special attention zone extending approximately 100 feet horizontally from the edge of perennial streams, lakes and other water bodies. The key proposed change in riparian management direction in Alternatives 2 through 4 would provide for greater management flexibility. On page 3 -15, the DEIS states that the aquatic and riparian ecosystems protection of the 100 foot horizontal special emphasis zone measured from the edge of the perennial stream may not be sufficient in all situations and could be too stringent in others. Please give a few examples of when this buffer zone would be too stringent. U.S. EPA is suggesting that a minimum buffer zone for riparian areas is still upheld in the LRMP. However, we agree with greater management flexibility in increasing that area.

We realize that future project-specific documents are likely to address this next issue. However, we recommend that areas that will possibly be managed by even aged cutting in MAs 2.1 and 2.2 be shown on the Preferred Alternative Management Area Maps in the Final EIS.

This would give the reviewer a better idea of the location of these areas in relation to water bodies and late successional habitat.

Some rivers have been designated as study rivers for being considered for Wild and Scenic River status. Does the USFS have a timeline for studies to be completed on these rivers?

All Terrain Vehicles (ATV) Management

Please provide more detail regarding what factors are considered when designating more trail mileage within the Operational Maintenance Level (OML) 2 and OML 3 roads. Will only the properly improved roads be considered for designation? What precautions will be taken to avoid car/ATV accidents on these roads (particularly OML 3)? If an OML 1 road is designated as part of an ATV trail, will it be improved before designation to minimize negative environmental impacts? Will these designated trails be located near any areas where quiet is expected to be part of the recreational experience?

Deer Management

Realizing that the Michigan Department of Natural Resources (DNR) manages the deer population as a game species, U.S. EPA has concerns about the impact of deer overpopulation on forest structure and ecology. Please discuss the interaction that takes place between the USFS and Michigan DNR to help keep the deer population at a size that is not detrimental to the habitat (particularly cedar and hemlock). We encourage close coordination between USFS and Michigan DNR on this issue. We recommend that the Final EIS articulate USFS's perspective on optimal deer population for the Ottawa.

Hemlock Regeneration

We are pleased that the USFS, Michigan Technological University and Michigan DNR will be conducting a study to determine the effectiveness of different methods to regenerate hemlock. If a method is found, we suggest encouraging private landowners to take part in this effort as well.

Old Growth

Representing old growth on the Preferred Alternative Management Area Maps would be helpful to the reviewer for determining how continuous the old growth is throughout the Ottawa and determining the prospects of obtaining a completely continuous canopy. We suggest outlining goals to produce a continuous old-growth canopy.

Page 1-14 of the DEIS does not exclusively preclude even aged management adjacent to old growth in Alternatives 2-4. In what circumstances would this be necessary? We recommend a transition area (e.g., uneven-aged buffer) between old growth and even- aged management. This would reduce the likelihood that cow birds would invade these old growth areas and further harm neotropical migrant birds during their breeding period in this habitat.

General

Regardless of which alternative is chosen, please provide a summary paragraph explaining why the alternative provides the best management direction for the Ottawa. In addition, please provide a discussion of the cumulative impacts of forest fragmentation and edge effects on native species and migratory birds due to logging or other activities.

Will the environmental impacts of specific river management plans, dam decommissioning, surface disturbing mineral exploration, and dredging activities be presented in future Environmental Assessments or Environmental Impact Statements? If not, please provide more detailed discussion of what the possible negative environmental effects are from these future projects and what Best Management Practices are used to avoid impacts.

The Cumulative Effects section on page 3-163 of the DEIS states,

> "Overall, the Ottawa would maintain a relatively remote character. In comparison, divesting of corporate timberlands has contributed to loss of recreational access and increased developments as these lands are subdivided and purchased by private individuals. This is occurring in and around the Ottawa including neighboring Wisconsin."

Please discuss in the Final EIS how the USFS will address this trend. Is it possible for the USFS to purchase the corporate timberlands when available? If a developer purchases the divested corporate timberland, are there any programs in place to work with the developer and local government to influence development patterns, and control nonnative flora and fauna to the benefit of adjacent USFS holdings?

Typographical errors

On P. 1-8 of the DEIS the last sentence appears incomplete.